

1 501 U.S. 89 (1991). Plaintiff should be entitled to reasonable attorney fees and expenses pursuant to
2 28 U.S.C. § 2412(d), upon proper request to this Court. Plaintiff should be entitled to costs as
3 enumerated in 28 U.S.C. § 1920, under 28 U.S.C. § 2412(a).

4 The parties further request that the Clerk of the Court be directed to enter a final judgment in
5 favor of Plaintiff and against Defendant, reversing the Commissioner's final decision.
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8 Dated: June 18, 2025 Respectfully submitted,

9 /s/ Kate Mara Albert
10 KATE MARA ALBERT
11 (*as authorized via email)
Attorney for Plaintiff

12 Dated: June 18, 2025 Respectfully submitted,

13 SUE FAHAMI
14 Acting United States Attorney

15 /s/ Jeffrey E. Staples
16 JEFFREY E. STAPLES
17 Special Assistant United States Attorney
Attorneys for Defendant

18 IT IS SO ORDERED:

19 
20 UNITED STATES DISTRICT JUDGE
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22 DATED: June 20, 2025
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused a copy of the above **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF** to be served upon the following by:

CM/ECF:

Kate Mara Albert
fdc@ssihelp.us

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 18, 2025

/s/ Jeffrey E. Staples
JEFFREY E. STAPLES
Special Assistant United States Attorney